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Air Maui

DEPT OF TRANSPORTATION

01 MAY 20 AM 11:55

Docket Management System
US Department of Transportation
Room PL401, 400 Seventh Street, SW
Washington, DC

May 16, 2001

Re: Docket Number FAA-2001-8690 - 9
National Parks Air Tour Management Act

To Whom It May Concern:

I am writing to comment on the 5000' AGL altitude that is proposed as part of the definition and restrictions of the National Parks Air Tour Management Act.

In reading through the Act, I have not found any reference to justify the 5000' altitude. While some altitude definition/restriction is intended to minimize noise or visual impact, how was the proposed 5000' AGL altitude chosen? Were noise/visual impact studies done? Is there some safety consideration associated with 5000' AGL?

Lacking any specific references to altitude or safety studies, it is my guess that 5000' AGL is an arbitrary figure, assumed to be "high enough" to deter unregulated flights over the defined management area, without regard to local weather and terrain factors that could impact flights over or around the management area.

I suggest that the proposed AGL altitude needs to be determined for each specific management area, taking into account the regional terrain and weather, as well as other safety factors. In addition, there should be considerations for low level "corridors" that would allow unregulated traffic to pass through regions of the management area that would not be seriously impacted.

In summary, the concept of a generic, system-wide 5000' AGL altitude seems arbitrary and contrary to flight safety.

Regards,


Steve Egger
Director of Operations